

ORIGINAL

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NORTHERN DIST. OF TX
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

JESSICA SALMERON

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§
§

Criminal No.

3-13CR-236-M

FACTUAL RESUME

PLEA:

Information, Count One:

Bank Theft

In Violation of 18 U.S.C. § 2113(b)

PENALTY:

The maximum penalties the Court can impose for Count One of the Information include:

- a. imprisonment for a period of not more than 10 years;
- b. a fine not to exceed \$250,000.00;
- c. a term of supervised release of not more than three years, which may follow any term of imprisonment. If Defendant violates the conditions of supervised release, she could be imprisoned for the entire term of supervised release;
- d. a mandatory special assessment of \$100.00;
- e. restitution to victims or to the community, which Defendant agrees will include restitution arising from all relevant conduct, and not limited to that arising from the offense of conviction alone; and
- f. costs of incarceration and supervision.

ELEMENTS OF THE OFFENSE:

To prove a charge of Bank Theft, a violation of 18 U.S.C. § 2113(b), the United States must prove the following elements beyond a reasonable doubt:

First: The defendant took and carried away money belonging to or in the care, custody, control, management, possession of Citibank N.A.;

Second: That at that time Citibank N.A., a bank had its deposits insured by the Federal Deposit Insurance Corporation

Third: That the defendant took and carried away such money with the intent to steal;

Fourth: That such money exceeded \$1,000 in value.

STIPULATED FACTS:

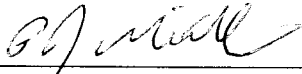
Jessica Salmeron, the Defendant, worked as an employee of Citibank N.A. ("Citibank") between 1998 and 2011 at 6460 MacArthur Blvd., Irving, Texas. Citibank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

The Defendant opened two bank accounts (one checking account and one savings account) under a false name, Erica Chavez (the "Chavez Checking Account" and "Chavez Savings Account"). "Erica" was the first name of one of the Defendant's sisters and "Chavez" was the last name of another one of the Defendant's sisters. The Defendant did not have the consent of her sisters to open up an account using either of their names.

The Defendant knowingly transferred, credited, and deposited funds from other Citibank and Citibank customer accounts into the Chavez Checking Account and the Chavez Savings Account, without the knowledge, permission, or consent of Citibank or Citibank's customers.

For example, the Defendant admits that, in or about December 2010, in the Dallas Division of the Northern District of Texas, that she did take and carry away with intent to steal and purloin approximately \$4,185.33 of money, belonging to and in the care, custody, control, management and possession of Citibank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

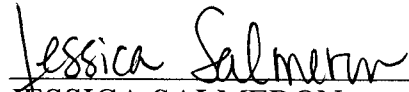
The Defendant repeated this behavior over several months, eventually taking and carrying away with the intent to steal and purloin approximately \$76,781.41 of money, belonging to and in the care, custody, control, management and possession of Citibank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.



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June 24, 2012
Date



JESSICA SALMERON

Defendant

6/24/13
Date



CARLTON C. McCLARTY

Attorney for the Defendant

6/24/13
Date